

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JENS H.S. NYGAARD,

Plaintiff,

V.

FÉDÉRATION INTERNATIONALE DE
L'AUTOMOBILE, FORMULA ONE
MANAGEMENT LTD., FORMULA ONE
WORLD CHAMPIONSHIP LTD.,
MERCEDES-BENZ GRAND PRIX LTD.,
DAIMLER AG, LEWIS HAMILTON, RED
BULL TECHNOLOGY LTD., RED BULL
RACING LTD., FERRARI S.P.A.,
CHARLES LECLERC, and DALLARA
AUTOMOBILI S.P.A.,

Defendants.

[Decorative separator consisting of a series of repeating scroll-like motifs]

Case No. 6:20-cv-00234-ADA

**DEFENDANTS' SUPPLEMENTAL REPORT REGARDING
NARROWING OF PRIOR ART**

Pursuant to the Court’s Order Governing Proceedings (Dkt. No. 110) and in accordance with the parties’ Joint Report Regarding Narrowing of Asserted Claims and Prior Art (Dkt. No. 286), the Defendants respectfully submit the following supplemental report.

Defendants elect to pursue the following thirteen grounds:

1. De Ruffi
2. De Ruffi and Daimler '122
3. De Ruffi and Nygaard '906
4. Nygaard '906 and De Ruffi
5. Nygaard '906 and What Car
6. Nygaard '906 and Haslegrave
7. Basile

8. Basile and the knowledge of a POSITA
9. Basile and De Ruffi
10. Basile and Haslegrave
11. Henricks and the knowledge of a POSITA
12. Henricks and De Ruffi
13. Henricks and Haslegrave

Dated: March 25, 2022

Respectfully submitted,

/s/ Jeffrey Johnson

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LTD.**

CERTIFICATE OF SERVICE

The undersigned certifies that on March 25, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system.

/s/ David Medina
David Medina